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September 7, 2011



MI SEP 12 MIL: 35

Via Federal Express

a fungicide.

United States Environmental Protection Agency - East Attn: TSCA Section 8(e) / Room 6428 1201 Constitution Avenue, NW Washington, DC 20004

The test material was administered by gavage as a suspension in 1% Carboxymethylcellulose suspension in highly deionized water (1% CMC) to 20 female guinea pigs per group at doses of 0, 5, 15, 50 and 180 mg/kg body weight/day on gestation day (GD) 6 through GD 63. A standard dose volume of 10 mL/kg body weight was used for each group.

Maternal serum concentrations of a variety of steroid hormones were determined twice during the study to monitor gestation-stage dependent changes in hormone levels.

All animals from test group 4 (180 mg/kg bw/d) were sacrificed prematurely by decapitation under Isoflurane anesthesia, for humane reasons. By the time of sacrifice, the dose of 180 mg/kg was lethal for 7 out of 20 animals in this group and caused further distinct signs of intoxication in the remaining animals, such as clinical observations (abortion, poor general state), distinctly reduced food consumption and loss of body weight.

At the other dose levels, top dose now being 50 mg/kg bw/d, neither significant signs of systemic toxicity nor effects on reproduction or offspring were detected.



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The only remarkable observations were alterations in steroid hormones starting at a dose of 5 mg/kg bw/d. The increases of estradiol precursors such as testosterone and androstenedione are most likely related to inhibition of aromatase. The increase of corticoids, mainly at 50 mg/kg bw/d, suggest a higher steroid hormone production of the adrenals, possibly related to stress.

[accordance with EPA's policy.

Please note that a confidential version of this letter is enclosed, treating the chemical identity and company identity as Confidential Business Information.

A Confidentiality Substantiation Questionnaire is being submitted.

Sincerely,

Enclosures